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Attorney for Laura A. Gaddy and the Class

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF UTAH

LAURA A. GADDY, individually and
 on behalf of all others similarly
 situated,

Plaintiff,
 v.

CORPORATION OF THE PRESIDENT
 OF THE CHURCH OF JESUS CHRIST
 OF LATTER-DAY SAINTS, a Utah
 corporation sole,

Defendant.

**ERRATA TO [PROPOSED]
 SECOND AMENDED COMPLAINT
 (2AC). Filed as Ex. 1 to
 “PLAINTIFF’S MOTION FOR
 LEAVE TO FILE PROPOSED
 SECOND AMENDED
 COMPLAINT”**

2:19-cv-554-RJS-DBP

Chief District Judge Robert J. Shelby

Magistrate Judge Dustin B. Pead

Plaintiff corrects the [Proposed] Second Amended Complaint, filed as Exhibit One [ECF #85-1] to “Plaintiff’s Motion for Leave to File the Proposed Second Amended Complaint” [ECF #85, filed March 17, 2021] as follows:

- ¶73, p. 24, “Perpetual Immigration Fund,” should be “Perpetual **Education** Fund.”
- ¶95, p. 28, The diagram showing the “Nonprofit” side of the Mormon Corporate Empire indicates “8 Qs of Seventy.” That number should read “**12** Qs of Seventy.”¹

¹ Four more Quorums of the Seventy were added after the Complaint was filed on Aug. 5, 2019.

- ¶110 The phrase “are indoctrinated for two months,” should be: “are indoctrinated for **an average of** two months.”
- ¶ 350, The phrase “Defendant’s conduct was a substantial factor in bringing about Plaintiffs’ injuries which are of a type that a reasonable person would foresee as a likely result of his or her conduct.” The phrase should read: “Defendant’s conduct was **an actual cause of, and substantially contributed to**, Plaintiffs’ injures and damages which are of a type that a reasonable person would foresee as a likely result of his or her conduct.
- ¶ 358. The phrase: “The important facts that COP failed to disclose are the following:” should read: “The important facts that COP failed to disclose **include, but are not limited to** the following:”

Dated: March 31, 2021

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